



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Region Office
PO Box 330316, Shoreline, WA 98133-9716 • 206-594-0000

July 25, 2024

James Robertson
Star Forge LLC, dba Jorgensen Forge
8531 E. Marginal Way S.
Tukwila, WA 98108

Re: Administrative Order

Administrative Order Docket #	22970
Site Location	Jorgensen Forge (former) 8531 E. Marginal Way S. Tukwila, WA 98108

Dear James Robertson:

The Department of Ecology (Ecology) is issuing the enclosed Administrative Order (Order) requiring Star Forge LLC, dba Jorgensen Forge to comply with:

- Chapter 90.48 Revised Code of Washington (RCW) - State of Washington Water Pollution Control Act.
- Chapter 173-201A Washington Administrative Code (WAC) - Water Quality Standards for Surface Waters of the State of Washington.

If you have questions, please contact Jessica Kasmari at Jessica.kasmari@ecy.wa.gov or 425-758-3799.

Sincerely,

Rachel McCrea
Water Quality Section Manager
Northwest Region Office

Enclosure: Administrative Order Docket #22970

By Certified Mail #9171 9690 0935 0233 1459 40

Administrative Order #22970

James Robertson

Page 2

ecc: Amy Jankowiak, Ecology
 Jessica Kasmari, Ecology
 Stacy Fox, DH Environmental, Inc.
 David Hill, DH Environmental, Inc.

State of Washington
Department of Ecology

In the Matter of an Administrative Order Against
STAR FORGE LLC, DBA JORGENSEN FORGE
JAMES ROBERTSON
Administrative Order Docket #22970

To: James Robertson
Star Forge LLC, dba Jorgensen Forge
8531 E. Marginal Way S.
Tukwila, WA 98108

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The Department of Ecology (Ecology) has issued this Administrative Order (Order) requiring Star Forge LLC, dba Jorgensen Forge to comply with:

- Chapter 90.48 Revised Code of Washington (RCW) - State of Washington Water Pollution Control Act.
- Chapter 173-201A Washington Administrative Code (WAC) - Water Quality Standards for Surface Waters of the State of Washington.

Chapter 90.48.120(2) RCW gives Ecology the authority to issue Administrative Orders requiring compliance whenever it determines that immediate action is necessary to accomplish the purposes of Chapter 90.48 RCW.

1. Order to Comply

Ecology's determination that immediate action is necessary to accomplish the purposes of Chapter 90.48 RCW is based on the information listed below.

Star Forge LLC, dba Jorgensen Forge (Star Forge) previously operated the facility at 8531 E. Marginal Way S. and was conditionally authorized to discharge stormwater associated with industrial activity under Industrial Stormwater General Permit (ISGP) #WAR003231 (Permit). The site has undergone demolition, and all industrial equipment has been removed. Star Forge applied for and received Notice of Termination of the Permit on June 10, 2024.

The prior owner of the facility, Jorgensen Forge Corporation, filed for bankruptcy in 2016. The facility was subsequently purchased by Star Forge, LLC and Star Forge continued to operate the facility under the name Jorgensen Forge. The past operations occurred in one large building (main building) with a footprint of approximately 283,000 square feet (8.03 acres). The main

building included the Melt Shop, Forge Shop, Heat Treat, Hollowbore, and Machine Shops. There were also several smaller buildings that housed an office, support services, storage, and an aluminum heat-treat facility. The buildings were demolished after obtaining a demolition permit from the City of Tukwila. Most of the property is paved with concrete or asphalt. The stormwater treatment system remains and discharges to the Duwamish River via outfall 3.

Ecology issued Administrative Order #18074 on April 9, 2020 and Amended Administrative Order #18160 on July 20, 2020 (collectively, the “2020 Order”) related to contamination on site (soil and groundwater) requiring the collection of stormwater, treatment, monitoring and reporting prior to discharge to the Lower Duwamish Waterway, a Superfund cleanup site.

Water quality violations prior to April 2020, under the Permit showed elevated levels of PCBs, zinc, copper, petroleum hydrocarbons, turbidity, and pH. The Permit did not have water quality sampling requirements or benchmarks for all known constituents of concerns on-site, such as PCBs, arsenic, barium, cadmium, chromium, copper, lead, mercury, nickel, selenium, silver, zinc, gasoline-range hydrocarbons, diesel and oil-range hydrocarbons, and BTEX. The 2020 Order required the collection of all contaminated stormwater to go to a treatment system that could ensure indicator levels set by the 2020 Order would be met prior to batch discharge. The indicator levels were set to assure that water quality standards would be met for the known contaminants. The 2020 Order also required monitoring and reporting of monitoring data as well as notification of indicator level exceedances.

Star Forge has ceased all industrial activity and has completed demolition of the buildings on the site. Due to the presence of contamination in the soil and groundwater, Star Forge plans to keep the treatment system on site and operating until the site is sold to a new owner. This Order terminates and replaces the 2020 Order but continues the 2020 Order requirements for collection, treatment, monitoring and reporting separate from the terminated Permit. Batch treatment is no longer necessary as the site has shown that the treatment regularly meets indicator levels.

In order to comply with the Water Quality Standards for discharges to surface waters of the State of Washington, and to comply with Chapter 90.48 RCW, this Order continues to require collection of contaminated stormwater, treatment to indicator levels, monitoring, and reporting. Ecology used updated indicator levels consistent with current standards and included parameters that were in the Permit but not the Order including Zinc, Copper, Lead, Diesel and oil-range hydrocarbons, turbidity, and pH.

Corrective Actions Required:

For these reasons and in accordance with RCW 90.48.120(2), it is ordered that Star Forge LLC take the following actions. These actions are required at the location formerly known as Jorgensen Forge at 8531 E. Marginal Way S, Tukwila, WA.

1. Capture, contain, and treat all contaminated stormwater prior to discharge to the receiving waterbody.
2. Use the existing Ecology-approved treatment system and media filtration to treat any contaminated stormwater. Ecology must be notified in advance if any changes in the treatment are made, with the exception of routine maintenance.
3. All captured solids from the treatment of the contaminated stormwater must be transported to an approved disposal facility based on the level of contamination.
4. Star Forge may use a flow-through treatment system. All contaminated stormwater must be sampled monthly while discharging and tested for the parameters listed in Table 1.
5. If any of the Indicator Levels listed in Table 1 are exceeded, Star Forge must stop the discharge of contaminated stormwater to the receiving waterbody until it has been retested to determine that all parameters are equal to or below the Indicator Levels in Table 1. If any of the Indicator Levels are exceeded after being retested, Star Forge must modify the existing flow-through treatment system to increase its effectiveness, install an additional Ecology-approved treatment system, or truck the contaminated stormwater off-site for disposal in an approved manner. Star Forge may also discharge the treated water to sanitary sewer in accordance with the conditions of the discharge authorization from the proper sewer authority.
6. Sampling results for the contaminants listed in Table 1 must be reported by email to the lead Duwamish Inspector (as listed in the contact information in section 4 of this Order). Results of monthly sampling must be submitted quarterly (due April 15 for the first quarter; July 15; October 15; and January 15 of each year). If sampling is conducted more frequently than required by this Order, the results of this monitoring must be included. If sampling is not conducted for one or more months in a quarter, include a description of why no sample was collected and/or analyzed.
7. Any discharge to Waters of the State in exceedance of the Indicator Levels in Table 1 must be reported to the Department of Ecology as follows:
 - a. Immediately notify Ecology by calling the regional 24-hour Environmental Report Tracking System (ERTS) phone number (206) 594-0000.
 - b. Cease the discharge until Indicator Levels can be met.
8. If a modification of this Order is desired, a written request must be submitted to Ecology and if approved, Ecology will issue an amendment to this Order. Ecology retains the right to make modifications to this Order through supplemental Order, or amendment to this Order, if it appears necessary to further protect water quality.

Table 1. Marine/Brackish Water Parameters

Star Forge must use the specified analytical methods, detection limits (DLs) and quantitation levels (QLs) in the following table for monitoring unless the method used produces measurable results in the sample and EPA has listed it as an EPA-approved method in 40 CFR Part 136. If Star Forge uses an alternative method, not specified in the order and as allowed above, it must report the test method, DL, and QL to Ecology.

Pollutant & CAS No. (if available)	Sampling Frequency*	Sample Type	Indicator Level, µg/L unless otherwise noted	Required Analytical Protocol	Detection Level, µg/L unless otherwise noted	Quantitation Level, µg/L unless otherwise noted
PETROLEUM HYDROCARBONS						
BTEX (benzene, toluene, ethylbenzene and O,M,P xylenes)	Monthly	Grab	2.0 ^a	SW 846 8021/ 8260	1.0	2.0
Diesel and Oil-Range Hydrocarbons (NWTPH-Dx) ^b	Monthly	Grab	250 ^a	NWTPH-Dx	250	250
Gasoline-Range Hydrocarbons (NWTPH-Gx) ^c	Monthly	Grab	250 ^a	NWTPH-Gx	250	250
METALS						
Arsenic, Total (7440-38-2)	Monthly	Grab	69 ^d	200.8	0.1	0.5
Barium, Total (7440-39-3)	Monthly	Grab	1,000 ⁱ	200.8	0.5	2.0
Cadmium, Total (7440-43-9)	Monthly	Grab	42.25 ^d	200.8	0.05	0.25
Chromium, Total (7440-47-3)	Monthly	Grab	1100 ^h	200.8	0.2	1.0
Copper, Total (7440-50-8)	Monthly	Grab	5.78 ^d	200.8	0.4	2.0
Lead, Total (7439-92-1)	Monthly	Grab	220.82 ^d	200.8	0.1	0.5
Mercury, Total (7439-97-6)	Monthly	Grab	2118 ng/L ^d	1631E	0.2 ng/L	0.5 ng/L
Nickel, Total (7440-02-0)	Monthly	Grab	74.75 ^d	200.8	0.1	0.5
Selenium, Total (7782-49-2)	Monthly	Grab	290.58 ^d	200.8	1.0	1.0
Silver, Total (7440-22-4)	Monthly	Grab	2.24 ^d	200.8	0.04	0.2
Zinc, Total (7440-66-6)	Monthly	Grab	95.14 ^d	200.8	0.5	2.5
POLYCHLORINATED BIPHENYLS (PCBs)						
PCBs, Total ^f (8082A)	Monthly	Grab	0.016 ^g	8082A (Update V)	0.016 ^g	0.016 ^g

Pollutant & CAS No. (if available)	Sampling Frequency*	Sample Type	Indicator Level, µg/L unless otherwise noted	Required Analytical Protocol	Detection Level, µg/L unless otherwise noted	Quantitation Level, µg/L unless otherwise noted
TURBIDITY AND pH						
Turbidity	Monthly	Grab	25 NTU		SM2130 ^k	
pH	Monthly	Grab	6.5 - 8.5 SU		SM4500-H ⁺ B	

NOTES:

a	No applicable surface water criterion; value is laboratory quantitation level.
b	NWTPH-Dx = Northwest Total Petroleum Hydrocarbons – Semi-volatile (“diesel”) for diesel range organics and heavy oils (includes jet fuels, kerosene, diesel-oils, hydraulic fluids, mineral oils, lubricating oils, and fuel oils).
c	NWTPH-Gx = Northwest Total Petroleum Hydrocarbons – Volatile petroleum products including aviation and automotive gasolines, mineral spirits, Stoddard solvent, and naphtha.
d	Acute – Marine Water Toxic Substances Criteria (WAC 173-201A-240) calculated using conversion factors per Table 240.
e	Or equivalent.
f	Total PCBs are the sum of all congener or all isomer or homolog or Aroclor analyses.
g	Value is the Lowest Level of Quantitation (LLOQ) for water samples for PCBs by Method 8082A, Update V.
h	Indicator Level total chromium is actually for hexavalent chromium using Acute – Marine Water Toxic Substances Criteria (WAC 173-201A-240) because there is no water quality standard for total chromium.
i	Applicable surface water criterion does not exist for barium. The indicator level of 1,000 µg/L for barium is based on groundwater quality standards to be protective of human health and the environment.
*	Sampling frequency is a minimum of monthly.

2. Failure to Comply With This Order

Failure to comply with this Order may result in the issuance of civil penalties or other actions, whether administrative or judicial, to enforce the terms of this Order.

3. Your Right to Appeal

You have a right to appeal this Order to the Pollution Control Hearings Board (PCHB) within thirty (30) days of the date of receipt of this Order. The appeal process is governed by Chapter 43.21B RCW and Chapter 371-08 WAC. "Date of receipt" is defined in RCW 43.21B0.001(2).

To appeal, you must do all of the following within thirty (30) days of receipt of this Order:

- File your appeal and a copy of this Order with the PCHB (see address below). Filing means actual receipt by the PCHB during regular business hours.
- Serve a copy of your appeal and this Order on Ecology by mail, in person or by email (see addresses below).

You must also comply with other applicable requirements in Chapter 43.21B RCW and Chapter 371-08 WAC.

Filing with the PCHB

For the most current information regarding filing with the PCHB, visit: <https://eluhho.wa.gov/> or call: 360-664-9160.

Service on Ecology

Street Addresses:

Department of Ecology
Attn: Appeals Processing Desk
300 Desmond Drive SE
Lacey, WA 98503

Mailing Addresses:

Department of Ecology
Attn: Appeals Processing Desk
PO Box 47608
Olympia, WA 98504-7608

E-Mail Address:

ecologyappeals@ecy.wa.gov

4. Contact Information

Please direct all questions about this Order to:

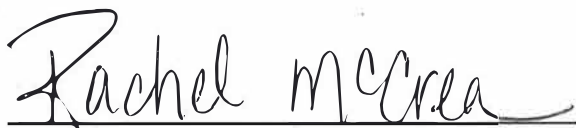
Jessica Kasmari
Department of Ecology
Northwest Region Office
P.O. Box 330316
Shoreline, WA 98133-9716

Phone: 425-758-3799
Email: Jessica.kasmari@ecy.wa.gov

5. More Information

- **Pollution Control Hearings Board Website:**
<https://www.eluho.wa.gov>
- **Chapter 43.21B RCW – Environmental and Land Use Hearings Office – Pollution Control Hearings Board:**
<https://app.leg.wa.gov/RCW/default.aspx?cite=43.21B>
- **Chapter 371-08 WAC – Practice and Procedure**
<https://app.leg.wa.gov/WAC/default.aspx?cite=371-08>
- **Chapter 34.05 RCW – Administrative Procedure Act**
<https://app.leg.wa.gov/RCW/default.aspx?cite=34.05>
- **Ecology's Laws, Rules, & Rulemaking Website**
<https://ecology.wa.gov/Footer/rulemaking>

6. Signature



Rachel McCrea
Water Quality Section Manager
Northwest Region Office

July 25, 2025
Date